

**Remarks**

The above Amendments and these Remarks are in reply to the Office Action mailed April 12, 2006. A Petition for Extension of Time is submitted herewith, together with the appropriate fee.

**I. Summary of Examiner's Rejections**

Prior to the Office Action mailed April 12, 2006, Claims 1, 2, 4-12, 14-20, 22-24, 28, 30, 31 and 34-39 were pending in the Application. In the Office Action, Claims 1, 2, 4, 5, 7, 11, 12, 14, 15, 17 and 22-33 were rejected under 35 U.S.C. 103(a) as being unpatentable over Meltzer et al. (U.S. Patent No. 6,226,675, hereafter Meltzer) in view of Kuznetsov (U.S. Patent No. 6,772,413). Claims 6, 8, 9, 16, 18 and 19 were rejected under 35 U.S.C. 103(a) as being unpatentable over Meltzer in view of Borwankar (U.S. Patent No. 6,594,693). Claims 10 and 20 were rejected under 35 U.S.C. 103(a) as being unpatentable over Meltzer and Borwankar, in further view of Pinard et al. (U.S. Patent No. 6,230,287, hereafter Pinard). Claims 34-39 were rejected under 35 U.S.C. 103(a) as being unpatentable over Meltzer and Kuznetsov, in further view of Burridge (U.S. Patent No. 6,446,116).

**II. Summary of Applicant's Amendment**

The present Response amends Claims 1, 11, 38 and 39, leaving for the Examiner's present consideration Claims 1, 2, 4-12, 14-20, 22-24, 28, 30, 31 and 34-39. Reconsideration of the Application, as amended, is respectfully requested. Applicant respectfully reserves the right to prosecute any originally presented claims or canceled claims in a continuing or future application.

**III. Claim Rejections under 35 U.S.C. §103(a)**

In the Office Action mailed April 12, 2006, Claims 1 and 11 were rejected under 35 U.S.C. 103(a) as being unpatentable over Meltzer (U.S. Patent No. 6,226,675) in view of Kuznetsov (U.S. Patent No. 6,772,413).

**Claim 1**

Claim 1 has been amended by the current Response to more clearly define the embodiment therein. As amended, Claim 1 defines:

1. *(Currently Amended) A conversation manager executing on an intermediate collaboration server for managing the flow of messages in a collaboration system, comprising:
  - a conversation initiation logic that initiates a conversation among a plurality of participants, wherein said conversation is a collective set of messages exchanged by the plurality of participants according to an extensible protocol;
  - a participation registration logic that registers said participants in said conversation;
  - a conversation repository that stores conversation management data used to manage said conversation among said plurality of participants;
  - a plurality of business protocol handlers, each of which are configured to recognize a different business protocol vocabulary, and which may be used by a participant to send and to receive messages according to the particular business protocol vocabulary and process flow used by that participant;
  - a plurality of decoders that receive incoming messages from senders, identify protocol-specific headers in the incoming messages and assign the incoming messages to an appropriate business protocol handler;
  - a plurality of encoders that send outgoing messages to recipients, including assigning the outgoing messages to an appropriate business protocol handler that matches the business protocol vocabulary of the recipients; and
  - a transport configured to accept messages from the participants using any of the different business protocols, identify the business protocol being used, and invoke one or more of said plurality of decoders and encoders to communicate the messages between a first participant using a first business protocol vocabulary, and a plurality other participants using different business protocol vocabularies.*

Claim 1, as currently amended, defines that the conversation manager comprises a plurality of business protocol handlers, each of which are configured to recognize a different business protocol vocabulary, and which may be used by a participant to send and to receive messages according to the particular business protocol vocabulary and process flow used by that participant.

A plurality of decoders receive incoming messages from senders, identify protocol-specific headers in the incoming messages and assign the incoming messages to an appropriate business protocol handler. A plurality of encoders send outgoing messages to recipients, including assigning the outgoing messages to an appropriate business protocol handler that matches the business protocol vocabulary of the recipients. The conversation manager further comprises a transport configured to accept messages from the participants using any of the different business protocols, identify the business protocol being used, and invoke one or more of said plurality of decoders and encoders to communicate the messages between a first participant using a first business protocol vocabulary, and a plurality other participants using different business protocol vocabularies.

The advantages of the embodiment currently defined by Claim 1 include that it is independent of any particular business protocol vocabulary, so it can support any standards-based or proprietary business protocol or business protocol vocabulary. For example, one participant may use a RosettaNet business protocol vocabulary, while another participant may use an EDI business protocol vocabulary. By providing a plurality of business protocol handlers, the system allows for conversational communication between these collaboration participants that utilize different business protocols. This translation can be extended beyond the simple case of two participants having different protocols: instead a first participant (sender) can send messages using a first business protocol vocabulary, and a plurality other participants (recipients) can each use their own different business protocol vocabularies to receive the message. In the embodiment defined by Claim 1, this functionality is provided by a plurality of decoders that receive the incoming messages from senders, and assign the incoming messages to an appropriate business protocol handler; together with a plurality of encoders that send the outgoing messages to recipients, including assigning the outgoing messages to an appropriate business protocol handler that matches the business protocol vocabulary of the recipients.

Meltzer discloses a participant server which processes documents for commerce in trading partner networks. As disclosed by Meltzer, business interface definitions (BIDs), which describe the documents to be exchanged, are communicated to members of the network. The business interface definitions tell potential trading partners the services the company offers and the documents to use when communicating with such services. (Column 2, lines 34-48). A participant node includes resources for translating at least a portion of the input document into a format

readable according to the variant transaction processing architecture of the transaction process utilizing the information. (Column 5, lines 1-5).

Kuznetsov discloses a flexible transformation mechanism that facilitates generation of translation machine code on the fly. As disclosed by Kuznetsov, a stream of data arrives from an external source, such as an application server, and the headers and other selected fields are separated and processed to detect source and destination identification information, along with the data format and the protocol being used. At the lowest protocol levels, a unique address or other identification will suffice for identification, such as the combination of an IP address and a socket corresponding to a communication channel. (Column 9, line 58 - Column 10, line 5). One or more FMRFD parsers provide inputs to a DATADEF source interface and one or more DMAP parsers provide inputs to a DATAMAP source interface. The parsers can be selected as appropriate for parsing FMRFD inputs provided as C/C++ Headers, ASN.1 formats, IDL, or other standard or proprietary parsers can be adapted to generate the required DATADEF from the corresponding FMRFD formats. (Column 12, line 63 - Column 13, line 18).

Applicant respectfully submits that, as described above, Meltzer appears to disclose a system in which a participant communicates with another participant (or a group of participants) by a first (sending) participant sending a document that conforms to the specification or BID of a second (receiving) participant. The business interface definitions tell potential trading partners which services a participant offers, and which documents to use when communicating with such services. This process is different from the embodiment defined by Claim 1, wherein a participant is free to use any business protocol supported by the collaboration server, and is not restricted to conforming to the protocol of the receiving partner. Claim 1 has also been amended to more clearly define the system as comprising a plurality of decoders that receive incoming messages from senders, identify protocol-specific headers in the incoming messages and assign the incoming messages to an appropriate business protocol handler; and a plurality of encoders that send outgoing messages to recipients, including assigning the outgoing messages to an appropriate business protocol handler that matches the business protocol vocabulary of the recipients. Thus, whereas in Meltzer the BID definition allows a customer to place an order compliant with a document definition published in the BID of another party; in accordance with the embodiment of Claim 1, a sending participant is not required to be compliant with a recipient's specification, and

indeed a sending party can send messages in its own business protocol vocabulary, and have those messages translated into a variety of different business protocols corresponding to each of the recipients.

With regard to the Kuznetsov reference, Applicant respectfully submits that, as described above, Kuznetsov appears to describe a means of processing program language (for example C/C++ headers) headers which are contained in the stream of data. Formal machine readable format descriptions can be defined for each data format and/or network protocol to describe the structural layout of the packets or data streams or other data structures being translated. Applicant respectfully submits that Kuznetsov appears to describe a means of translating between network protocols, but does not appear to disclose an extensible business protocol that is independent of the network protocol. As such, the network protocols and data formats described in Kusnetsov differ substantially from the B2B business protocols that are the subject of Claim 1, examples of which include cXML, BizTalk, and RosettaNet. To more clearly differentiate this, Claim 1 has been amended to define that each of the plurality of business protocol handlers are configured to recognize a different business protocol vocabulary, and may be used by a participant to send and receive messages according to the particular business protocol vocabulary and process flow used by that participant.

In view of the above comments, Applicant respectfully submits that Claim 1 is neither anticipated by, nor obvious in view of the cited references, and reconsideration thereof is respectfully requested.

### **Claim 11**

Claim 11 has been amended similarly to Claim 1 to more clearly define the embodiment therein. Applicant respectfully submits that Claim 11, as amended, is likewise neither anticipated by, nor obvious in view of the cited references, and reconsideration thereof is respectfully requested.

### **Claims 38 and 39**

In the Office Action mailed April 12, 2006, Claims 38 and 39 were rejected under 35 U.S.C. 103(a) as being unpatentable over Meltzer (U.S. Patent No. 6,226,675) and Kuznetsov (U.S. Patent No. 6,772,413), in further view of Burridge (U.S. Patent No. 6,446,116).

Burridge discloses a method and apparatus for dynamically loading a transport mechanism in a multipoint data delivery system. A multi-point data delivery system provides a communication mechanism between users or a computer system which permits sending messages point to point, and point to multiple points. A resource locator (RL) corresponding to a collaboration session is requested from a registry. A location indicator of the RL in the registry is received from the registry. In response to receiving the location indicator of the RL in the registry, a transportation mechanism specified in the RL is dynamically loaded, and the collaboration session is joined. The transportation mechanism is a protocol stack identifying the transportation protocol used. The transportation protocols may include transmission control protocol (TCP), user datagrams protocol (UDP), remote method invocation (RMI), T.120, Common Object Request Broker Architecture (CORBA), Scaleable Reliable Multicast (SRM), and other transportation level implementations. (Column 1, line 55 - Column 2, line 7).

It appears from the above description that the network and transportation protocols described in Burridge differ substantially from the B2B business protocols that are the subject of Claims 38 and 39. As described above examples of business protocols include cXML, BizTalk, and RosettaNet. To more clearly differentiate this, Claims 38 and 39 have been amended to define that each of the plurality of business protocol handlers are configured to recognize a different business protocol vocabulary, and may be used by a participant to send and receive messages according to the particular business protocol vocabulary and process flow used by that participant.

In view of the above comments, Applicant respectfully submits that Claims 38 and 39 are neither anticipated by, nor obvious in view of the cited references, and reconsideration thereof is respectfully requested.

**Claims 2, 4-10, 12, 14-20, 22-24, 28, 30, 31 and 34-37**

In the Office Action mailed April 12, 2006, Claims 2, 4, 5, 7, 12, 14, 15, 17 and 22-33 were rejected under 35 U.S.C. 103(a) as being unpatentable over Meltzer (U.S. Patent No. 6,226,675) in view of Kuznetsov (U.S. Patent No. 6,772,413). Claims 6, 8, 9, 16, 18 and 19 were rejected under 35 U.S.C. 103(a) as being unpatentable over Meltzer in view of Borwankar (U.S. Patent No. 6,594,693). Claims 10 and 20 were rejected under 35 U.S.C. 103(a) as being unpatentable over Meltzer and Borwankar, in further view of Pinard (U.S. Patent No. 6,230,287). Claims 34-37 were

rejected under 35 U.S.C. 103(a) as being unpatentable over Meltzer and Kuznetsov, in further view of Burridge (U.S. Patent No. 6,446,116).

The above-referenced claims are not addressed separately, but it is respectfully submitted that these claims are allowable as depending from an allowable independent claim, and further in view of the current amendments to the independent claims, and the comments provided above. Applicant respectfully submits that Claims 2, 4-10, 12, 14-20, 22-24, 28, 30, 31 and 34-37 are similarly neither anticipated by, nor obvious in view of the cited references, and reconsideration thereof is respectfully requested.

**IV. Conclusion**

In view of the above amendments and remarks, it is respectfully submitted that all of the claims now pending in the subject patent application should be allowable, and reconsideration thereof is respectfully requested. The Examiner is respectfully requested to telephone the undersigned if he can assist in any way in expediting issuance of a patent.

Enclosed is a PETITION FOR EXTENSION OF TIME UNDER 37 C.F.R. §1.136 for extending the time to respond up to and including October 12, 2006.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 06-1325 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

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